

Exhibit 3

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**Re: In re Biopure Corporation Securities Class Action
Civil Action No. 1:03-cv-12628**

Dear Ed:

Enclosed please find notices of deposition for the named plaintiffs. On May 5, 2006, we requested available dates. You responded on May 11, 2006, giving us a date on which Mr. Erickson would be available in Boston, and Mr. Esposito would be available in New York. The enclosed deposition notices reflect those dates. However, we do not agree to conducting depositions of the named Plaintiffs, who have sued Biopure Corporation in Massachusetts, outside of the Commonwealth. As regards Mr. Erickson, we have, as you requested, noticed his deposition for May 31, 2006, with a 1:00 p.m. start time; please be prepared to produce Mr. Erickson at 10:00 a.m. the following morning, in case his deposition is not concluded before the close of business on May 31. Because we did not hear back from you relative to Mr. Gottlieb's or Ms. Bittman's schedules, we have selected dates in the first two weeks of June 2006.

Very truly yours,



Donald J. Savery

/caw

Enclosures

cc: Cathy A. Fleming, Esq.
Christopher F. Robertson, Esq.
Edward P. Leibensperger, Esq.